

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with the following motion:

	MDL Docket	18-296 Docket
Plaintiffs' Motion to Compel Discovery	No. 575	No. 211

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
581 (217 in 18-296 Docket)	576 (212 in 18-296 Docket)	Unredacted copy of Plaintiffs' Memorandum of Law in Support of Their Motion to Compel Discovery	The parties agree this document should remain sealed. Defendants believe the redacted material has been appropriately designated Confidential under the protective order in this case. While Plaintiffs believe some or all of the redacted material may not have been appropriately designated Confidential under the protective order in this case, and reserve all rights, they agree to continued sealing pending further discussions among the parties.		Contains information designated as Confidential under a protective order issued in this case [Doc. No. 464].
582 (218 in 18-296 Docket)		Certain Exhibits to the Declaration of Michael D. Blatchley in Support of Plaintiffs' Motion to Compel Discovery:	The parties agree this document should remain sealed. Defendants believe the materials have been appropriately designated Confidential under		Contains information designated as Confidential under a protective order issued in this case [Doc. No. 464] and information

		<p>Exhibit D – May 6, 2015 Email from Jennifer M. Martin to Lorna Christian</p> <p>Exhibit E – Email from Patrick Gibbs to Michael D. Blatchley dated August 19, 2019.</p> <p>Exhibit F – Plaintiffs’ First Request for Production of Documents to Defendant CenturyLink, Inc. dated September 4, 2019.</p> <p>Exhibit G – Plaintiffs’ First Interrogatories to Defendant CenturyLink, Inc. dated September 4, 2019.</p> <p>Exhibit H – Plaintiffs’ Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) dated September 17, 2019.</p> <p>Exhibit I – Defendants’ Initial</p>	<p>the protective order in this case and/or under the protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i> While Plaintiffs believe some or all of the materials may not have been appropriately designated Confidential under the protective order in this case, and reserve all rights, they agree to continued sealing pending further discussions among the parties.</p>		<p>designated confidential pursuant to the November 28, 2017 protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i></p>
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		<p>Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) dated September 17, 2019.</p> <p>Exhibit J – Defendants’ Supplemental Rule 26.01(a) Initial Disclosures dated August 14, 2019, <i>State of Minnesota v. CenturyTel</i>, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00015417-15424.</p> <p>Exhibit O – Email from Michael D. Blatchley to Ryan Blair dated February 25, 2020.</p> <p>Exhibit P – The State’s Memorandum of Law in Support of its Third Motion to Compel Discovery, <i>State of Minnesota v. CenturyTel</i>, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00021957-21968.</p>			
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		<p>Exhibit Q – Letter from Michael D. Blatchley to Patrick Gibbs dated October 15, 2019.</p> <p>Exhibit R – Letter from Patrick Gibbs to Michael D. Blatchley dated October 21, 2019.</p> <p>Exhibit T – Letter from Michael D. Blatchley to Sarah Lightdale dated November 7, 2019</p> <p>Exhibit V – Letter from Sarah Lightdale to Michael D. Blatchley dated November 19, 2019.</p> <p>Exhibit W – Letter from Michael D. Blatchley to Bryan Koch dated February 3, 2020.</p> <p>Exhibit X – Letter from Bryan Koch to Michael D. Blatchley dated February 14, 2020.</p> <p>Exhibit Y – Email from Bryan Koch to Julia Tebor dated</p>			
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		<p>January 27, 2020.</p> <p>Exhibit Z – Letter from Patrick Gibbs to Michael D. Blatchley dated November 4, 2019.</p> <p>Exhibit CC – Email from Julia Tebor to CenturyLink’s counsel dated January 10, 2020.</p>			
587		Unredacted copy of Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion to Compel Discovery	<p>The parties agree this document should remain sealed. Defendants believe the redacted material has been appropriately designated Confidential under the protective order in this case. While Plaintiffs believe some or all of the redacted material may not have been appropriately designated Confidential under the protective order in this case, and reserve all rights, they agree to continued sealing pending further discussions among the parties.</p>		Contains information designated as Confidential under a protective order issued in this case [Doc. No. 464].
589		Declaration of Ryan Blair in Support of Defendants’	The parties agree this document should remain sealed.		Contains information designated as Confidential

		<p>Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Discovery and Exhibits:</p> <p>Exhibit 1 – Defendant CenturyLink, Inc.'s Responses and Objections to Plaintiffs' First Set of Requests for the Production of Documents</p> <p>Exhibit 2 – October 21, 2019 Letter from Patrick E. Gibbs to Michael D. Blatchley</p> <p>Exhibit 3 – November 4, 2019 Letter from Patrick E. Gibbs to Michael D. Blatchley</p> <p>Exhibit 5 – February 3, 2020 Letter from Michael D. Blatchley to Bryan Koch</p> <p>Exhibit 6 – February 14, 2020 Letter from Bryan Koch to Michael D. Blatchley</p>	<p>Defendants believe the materials have been appropriately designated Confidential under the protective order in this case. While Plaintiffs believe some or all of the materials may not have been appropriately designated Confidential under the protective order in this case, and reserve all rights, they agree to continued sealing pending further discussions among the parties.</p>		<p>under a protective order issued in this case [Doc. No. 464].</p>
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		<p>Exhibit 7 – February 24, 2020 Email from Ryan Blair to Michael Blatchley</p> <p>Exhibit 8 – January 10, 2020 Email from Julia Tebor to Bryan Koch</p>			
591		<p>Declaration of Dana J. Moss in Support of Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion to Compel Discovery and Exhibits:</p> <p>Exhibit 2 – August 24, 2019 Email from Alex Baldwin to Russell Ponessa</p> <p>Exhibit 3 – August 24, 2019 Letter from Dana J. Moss to Alex K. Baldwin</p> <p>Exhibit 4 – August 22, 2019 Affidavit of Dana J. Moss in Support of Defendants’ Opposition to the State’s Third</p>	<p>The parties agree this document should remain sealed. Defendants believe the materials have been appropriately designated Confidential under the protective order in this case and/or under the protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i> While Plaintiffs believe some or all of the materials may not have been appropriately designated Confidential under the protective order in this case, and reserve all rights, they agree to continued sealing pending further discussions among the parties.</p>		<p>Contains information designated as Confidential under a protective order issued in this case [Doc. No. 464] and information designated confidential pursuant to the November 28, 2017 protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i></p>

		Motion to Compel Discovery in <i>State of Minnesota v.</i> <i>CenturyTel Broadband Services</i> <i>LLC et al.</i> and exhibits			
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DATED this 25th day of March, 2020.

**STOLL STOLL BERNE LOKTING &
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